

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

LEONARD R. BARR,

Defendant.

**Case No. 21-cv-11831-LJM-APP
HON.**

**PLAINTIFF'S MOTION TO ENTER FINAL JUDGMENT BY THE
CONSENT OF DEFENDANT LEONARD R. BARR**

Plaintiff Securities and Exchange Commission (the “SEC”) respectfully moves to enter final judgment as to Defendant Leonard R. Barr, who has consented to this relief. In support of the motion, the SEC states the following:

1. The SEC filed its Complaint in this case today, August 6, 2021. [See Docket No. 1.] In its Complaint, the SEC alleges that in 2016 and 2020, Defendant Barr engaged in insider trader – misusing confidential, material, non-public financial information of his employer, Domino’s Pizza. [See *id.* ¶¶ 9-29.]
2. The SEC alleges that, as a result of his conduct, Defendant Barr violated Section 10(b) of the Securities Exchange Act of 1934 [15 U.S.C. § 78j (b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5]. [See *id.* ¶ 2.]

3. The SEC generally seeks two forms of remedies: injunctions and monetary relief in the form of civil penalties. [*See id.* at 10.]

4. Defendant Barr has agreed to resolve this matter by consenting, without admitting or denying the allegations contained in the SEC's Complaint, to the entry of the proposed final judgment. The proposed final judgment awards the SEC all the injunctive relief sought and a civil penalty in the amount of \$68,360. Defendant Barr's signed consent to this relief (the "Consent") and the proposed final judgment is attached to this motion. [*See* Exhibits 1 and 2.]

5. Pursuant to Local Rule 7.1, the SEC conferred with Defendant Barr. Defendant Barr has agreed to waive service of a summons and the Complaint and to the entry of his Consent and the proposed final judgment. [*See* Exhibit 1 ¶¶ 1, 13.] In his signed Consent, Defendant Barr has agreed that the proposed judgment may be presented "to the Court for signature and entry without further notice." [*See* Exhibit 1 ¶ 13.]

6. Wherefore, the SEC respectfully requests that the Court enter the proposed final judgment as to Defendant Barr.

Dated: August 6, 2021

Respectfully submitted,

**UNITED STATES SECURITIES AND
EXCHANGE COMMISSION**

/s/ Gregory A. Kasper

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